

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



June 4, 1996

Ms. Marie L. Casey
NC Department of Transportation
Century Center
P. O. Box 25201
Raleigh, NC 27611

Subject: Coal Fly Ash Structural Fill at Jake Alexander Boulevard Extension from East of I-85 to SR 1004, Stokes Ferry Road in Salisbury (Rowan County). First Use of Fly Ash is Estimated to be June, 1996.

Dear Ms. Casey:

The Division of Solid Waste Management (DSWM) has received your May 6, 1996 notification of plans to utilize coal ash in the subject project. This letter of acknowledgement is confirmation of the verbal given to you by Bill Hocutt on May 21, 1996. The project is proposed to use 25,000-30,000 cubic yards of fly ash material from Fieldcrest-Cannon's Spencer, NC facility. Completion of the project is projected to be January 1, 1997. The information submitted satisfies the requirements for coal ash structural fill activities as set forth in Section .1700 of the Solid Waste Management Rules 15A NCAC 13B concerning beneficial use of coal combustion by-products.

Section .1703(b) allows the DOT to not submit construction plans with the other listed information required in the notification. However, it is required that DOT inform DSWM where a complete set of construction plans will be maintained. Based on our conversation of today, it is my understanding that a copy of the completed project plans will be kept at the Raleigh Construction Unit Office. Please inform me if that is incorrect or probable to undergo change.

Since no mention was made in your May 6 letter of any special changes or considerations such as those provided for in .1704(b), .1705(m) and .1706(e), we conclude that siting, design, construction, operation and closure on this project have no special factors or requirements. Please notify me immediately if that is not correct. Please note that Section .1706(d) states that: "The constructor or operator shall submit a certification to the Division signed and sealed by a registered professional engineer or signed by the Secretary of the Department of Transportation or his designee certifying that all requirements in the Rules of this Section have been met. The report shall be submitted within 30 days of application of the final cover." We have received Mr.

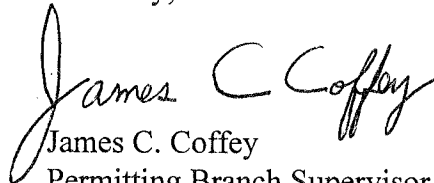
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Larry R. Goode's May 6, 1996 letter pertaining to recordation within 90 days following completion of the project. His statement of intent satisfies the .1707 requirement except for returning to the Division the original notarized statement with the Register's seal and the date, book and page number of recording as specified in .1707(c).

Analysis of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site indicate that the ash may have caused or contributed to violation of the 15A N.C. Administrative Code 2L Standards for arsenic, cadmium, chromium, lead, and selenium, as well as elevated sulfate levels. Based upon this information, the Solid Waste Management Division strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration and consider installation of groundwater monitoring wells on vulnerable sites before commencing fill operations.

Please contact me at (919) 733-0692 , extension 255 or Bill Hocutt at extension 260 if you have any questions about this.

Sincerely,

A handwritten signature in black ink that reads "James C Coffey". The signature is written in a cursive style with a large, looped "J" and a stylized "C" for the middle initial.

James C. Coffey
Permitting Branch Supervisor
Solid Waste Section

cc: Rick Doby
Julian Foscue
Bill Hocutt

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